LaGuardia Gateway Partners LLC
LaGuardia Airport
Central Terminal Building B
Room 3870
Flushing, NY 11371

May 3, 2017

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3

Subject: LaGuardia Airport Central Terminal Building Petition for Natural Gas Sub-Metering

Dear Hon. Burgess;

LaGuardia Gateway Partners ("LGP") has entered into a lease with the Port Authority of New York and New Jersey ("PANYNJ") to operate the Central Terminal B ("CTB") through 2050. As such, LGP is responsible for the oversight of the design and construction of the new CTB. LGP has hired the Skanska-Walsh Joint Venture ("SWJV") as our General Contractor. SJWV has hired the WSP | Parsons Brinckerhoff – HOK Joint Venture ("DJV") as the Engineers of Record ("EoR") and Architects of Record ("AoR") respectively.

The new CTB will be over 1.3 million square feet that consist of a Central Heat and Refrigeration Plant, a HeadHouse for arrivals and departures, two concourses, and two sky bridges which connects the concourses to the HeadHouse. The HeadHouse and Courses will consist of world class restaurants, airlines clubs, as well as full retail. Due to the unique design of the CTB and stringent security protocols throughout an airport terminal LGP is requesting the permission to sub-meter the natural gas usage of our tenants.

The low pressure natural gas system within LaGuardia's new CTB HeadHouse is designed to comply with applicable codes and standards listed by the New York City Port Authority and the gas company. Due to safety concern, unique site conditions, and construction limitations we are sub-metering the HeadHouse from a dedicated master gas meter located in the facilities central plant building. The Central Plant building is directly adjacent to the HeadHouse and is connected to the HeadHouse via a utility bridge.

Our natural gas system design provides a single low pressure gas main downstream from the Central Plant main gas meters and is routed directly to a secure and dedicated sub-meter room located within the HeadHouse. The sub-meter room will be accessed directly from the building's exterior. From this dedicated sub-meter room 14 metered individual gas lines have been routed throughout the HeadHouse to serve 13 commercial tenants in addition to a single main to service base building equipment.

A High pressure natural gas utility service enters the Central Plant building from below grade and is immediately regulated down to a low pressure service main before splitting into separate gas feeds to serve independent gas meters for both the HeadHouse and Central Plant. From the HeadHouse's master gas meter an 8-inch natural gas main is routed up 2(two) stories within the Central Plant to the utility bridge and then transgresses over to the HeadHouse via the utility bridge. The 8-inch pipe enters into the level 2(two) ceiling space of the HeadHouse, makes a sharp turn to the north, and then routes directly to a dedicated sub-meter room which is located on an exterior wall. The natural gas supply main enters the gas meter room from above and drops down on the east wall to 18-inch above finished floor. At this point the service main branches north and south to provide a header installed tight to the wall around the entire room allowing ample room for the installation of all gas company compliant sub-meters and regulators. From each sub-meter a dedicated main sized as prescribed by the New York City fuel Gas Code will emerge and route to designated locations to serve each commercial food service tenant. To ensure strict compliance with all applicable codes and safety standards our commercial tenants will only be responsible for installing and maintaining the natural gas piping systems downstream of this valved and capped stub-out.

The DJV is actively engaged in ongoing coordination meetings with National grid. All commercial tenant connections to the natural gas main from the Central Plant are visible and made within the sub-meter room. To control all taps to this main, Sub-meter installations shall be by the landlord. By means of multiple internal studies and conceptual test fits iterations, the engineering team determined that the approach presented ensures the local codes and applicable safety standards referenced by the Port Authority have been implemented. The design as prescribed by the code safeguards property, public welfare and the environment. By repositioning the sub-meters from the Central Plant our design takes into account the utility bridge traversing over an active roadway and a planned future expansion of the CTB that will be constructed around the utility bridge making the HeadHouse and the Central Plant a single building.

Several safety and design advantages gained as a result of this design approach include:

- The potentially unsafe scenario of routing a high pressure gas piping of at least 60 lbs. through the HeadHouse and Central Plant was eliminated by not locating the master meters in the HeadHouse.
- The potentially unsafe scenario of routing a 60 lb. gas line across the utility bridge was eliminated.
- There is only low pressure gas within the HeadHouse footprint.
- Where traversing over an active roadway we reduced the number of pipes crossing the

utility bridge from 14(fourteen) to a 1(one) master sleeved line. This reduced the number of pipes and fitting needing inspection and maintenance. This also reduce the actually amount of piping used from about 7000-ft combined to 500-ft.

- Eliminated the potentially unsafe scenario of 60 lbs. gas being routed underneath the slab of the HeadHouse.
- Eliminated the potentially unsafe scenario of 60 lbs. gas being routed underneath the slab of the planned future expansion.
- Minimized the potential of having to interrupt gas service to commercial tenants during the future building expansion.

All gas piping downstream of the master gas meter will be Schedule 40 black steel complying with ASME B31.9. All natural gas pipe sizes will use welded joints and have flanged connections using weld neck flanges. Natural gas pipe crossing the bridge will be exposed to weather conditions. This pipe and associated containment piping will be painted to prevent corrosion and to increase its visibility. Piping located in any concealed space will be installed in containment piping and vented to the atmosphere. Regardless of whether it is concealed or not, to further protect and secure the gas pipe routed between the main meter in the Central Plant and HeadHouse meter room, the gas pipe will be installed in a continuous containment pipe that is vented to outdoors.

Due to this unique design which the engineering team feels is the most practical, safe, and logistically feasible for the project sub-metering will need to be accomplished. National Grid has indicated the design does not meet their design standards. As such, National Grid has indicated they can't maintain and be responsible for the gas piping or the sub-meters. Additionally, they have concerns regarding accessing the meter rooms in a secure airport.

LGP is prepared to conform to all of the requirements of the Public Service Commission with respect to fair treatment for the tenants in the cost of the service by keeping the cost equal to, or below, the charges by National Grid for the same service. The meters will be manufactured by a reputable manufacturer and will be revenue grade gas meters. While the model has not been yet chosen, the meter will be and be in accordance with all ANSI Class 250 specifications.

LGP will serve as its own utility service provider. The gas meter readings will be automatically transferred into the CTB Revenue Management System. The same rules and regulations that the Local Utility Company must follow will be made part of the lease agreement in plain language. In the event of a complaint that the Sub Metering Agent cannot resolve with a Tenant or Tenants, LGP will retain the services of an independent arbitrator to resolve the complaint. The tenants will be notified, in writing, of the intention to submeter the gas service, and LGP will review the tenant's questions and comments. LGP will offer a fair rate for the gas service usage as part of the tenant's responsibility. All rules, regulations, and licensing requirements of the New York City Plumbing and Building codes will be incorporated into the meter installation for safety and to prevent fire or damage within the building.

The entity that will be retained to install the gas submeters will be a New York City Licensed Plumbing Contractor who will service and maintain the gas metering system. Both the Submetering Agent and the Sub-Contractor will have their regular and emergency phone numbers and addresses prominently displayed at each meter location. LGP will act as the Submetering Agent located at the CTB. SWJV will be responsible for entering into a contract with all sub-contractors on site.

The meters at the time of original installation will be tested and calibrated in accordance with acceptable testing procedures. The meters will be retested for accuracy when repaired, or if the monthly reconciliation between the total tenant recording and the Master Meter total diverge by more than 2% to 3%. In general, meters that become inaccurate or in need of repair, will register less than the actual amount of gas passing through the meter, much like a water meter. However, since the reconciliation will be made monthly, this will alert the Submetering Agent that meters will require inspection and testing.

Since LGP is in agreement that fair and impartial treatment for the tenants is a priority, termination of the service should not become a major concern. In the event of non-payment for the service within a reasonable period of time (35 days after the invoice has been rendered), a certificated notice will be sent to the tenant informing him of the indebtedness and providing him fifteen (15) days to make arrangements to settle the account. This is in general conformity to the PSC rules for Non-Residential Customers (16NYCRR-Part 13) and Part 12 of Title 16 of the Public Service Law for the resolution of the complaint. The main difference is that the Commission would not be involved with hearing or resolving the complaint.

We trust this petition will be reviewed and approval granted for the installation of gas submetering for this premises, and we would of course be happy to work with DPS Staff to address any issues or concerns that are raised by this approval.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Jamie Haviaris
Chief Technical Office
LaGuardia Gateway Partners

Cc: Andrew Jerome
MEP Lead, Commissioning Program Manager
LaGuardia Gateway Partners